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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

K.C., a minor, by and through her guardian  
*ad litem* Carolina Navarro; A.S., a minor, by  
and through her guardian *ad litem* Araceli  
Saenz; K.C., a minor, by and through her  
guardian *ad litem* Amber Neubert;  
JACQUELINE LAWRENCE; KEITH  
CHILDRESS, SR., in each case individually  
and as successor in interest to Keith  
Childress, Jr., deceased; and JACQUELINE  
LAWRENCE as administrator of the  
ESTATE OF KEITH CHILDRESS, JR.,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, UNITED STATES OF  
AMERICA DEPARTMENT OF JUSTICE;  
ROBERT BOHANON; BLAKE  
WALFORD; JAMES LEDOGAR; BRIAN  
MONTANA; and DOES 2-10, inclusive,

Defendants.

Case No. 2:16-cv-03039-JCM-NJK

**JOINT STIPULATION TO  
FILE AMENDED PLEADING**

1 **TO THE HONORABLE COURT:**

2 Plaintiffs K.C., a minor by and through her guardian ad litem Carolina  
3 Navarro, A.S., a minor by and through her guardian ad litem Araceli Saenz, K.C., a  
4 minor by and through her guardian ad litem Amber Neubert, Jacqueline Lawrence,  
5 Keith Childress Sr., and Jacqueline Lawrence as administrator of the Estate of  
6 Keith Childress Jr. (collectively "Plaintiffs"), by and through their attorney of  
7 record, and Defendants Las Vegas Metropolitan Police Department, Robert  
8 Bohanon, Blake Walford, and James Ledogar (collectively "Defendants LVMPD,  
9 et al."), by and through their attorney of record, hereby stipulates as follows:

10 1. Plaintiffs may file a Second Amended Complaint. The parties  
11 expressly stipulate that good cause exists for permitting the filing of the Second  
12 Amended Complaint because no party will be prejudiced and because it will  
13 facilitate the efficient progress of this litigation.

14 2. Plaintiffs seek to file a Second Amended Complaint replacing Jackie  
15 Lawrence with Frederick Waid as the administrator of the Estate of Keith  
16 Childress Jr., and naming the Department of Justice Marshals Service as a  
17 defendant.

18 3. The Second Amended Complaint, attached hereto, will serve as the  
19 operative complaint in the above-referenced litigation and will be deemed filed as  
20 of the date of the court's order approving this stipulation.

21 4. This stipulation will not affect the trial date or any other dates set by  
22 this Court.

23 IT IS SO STIPULATED.

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1 DATED: April 9, 2018

LAW OFFICES OF DALE K. GALIPO  
LAW OFFICE OF PETER GOLDSTEIN

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4 By: /s/ Dale K. Galipo  
5 Dale K. Galipo, Esq.  
6 Peter Goldstein, Esq.  
7 Attorneys for Plaintiffs

8 DATED: April 9, 2018

MARQUIS AURBACH COFFING

9  
10 By /s/ Craig R. Anderson  
11 Craig R. Anderson, Esq.  
12 Attorney for Defendants LVMPD, Ofc.  
13 Bohanon, Ofc. Walford, and Ofc. Ledogar

14 **GRANTED.** Pursuant to Local  
15 Rule 15-1(b), the Second  
16 Amended Complaint shall be  
17 filed and served by Plaintiffs no  
18 later than April 16, 2018.

19 IT IS SO ORDERED.

20 DATED this 9th day of April, 2018

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UNITED STATES MAGISTRATE JUDGE